

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Benahdam Hurt,	)	
	)	
Plaintiff,	)	Case No.: 17-cv-7909
	)	
v.	)	Hon. Rebecca Pallmeyer, Presiding Judge
	)	
James Corcoran, <i>et al.</i> ,	)	Hon. Sheila Finnegan, Magistrate Judge
	)	
Defendants.	)	

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**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE A JOINT  
STATEMENT OF FACTS IN EXCESS OF 80-FACTS IN SUPPORT OF  
DEFENDANTS' JOINT MOTION FOR SUMMARY JUDGMENT**

Defendants Dr. Hasina Javed, Dr. Faisa Kareemi, Colleen Delaney, Diana Hogan, and Drew Beck, by their attorney, Kwame Raoul, Attorney General of Illinois, respectfully move this Court to grant their motion to file a joint statement of facts in excess of 80 facts in support of their joint motion for summary judgment. Defendants state as follows in support of this unopposed motion:

1. Plaintiff alleges that Defendants violated his rights.
2. Defendants are filing a joint motion for summary judgment and supporting memorandum. Defendants are also filing a joint statement of facts pursuant to Federal Rule of Civil Procedure 56(c). Filing one joint statement of facts on behalf of all five Defendants promotes judicial economy, as there would be substantial overlap in the facts relevant to each Defendant.
3. Defendants require more than 80 facts to adequately reflect the record for the five Defendants.
4. Accordingly, Defendants request leave to file a joint statement including 101 facts in support of their joint motion for summary judgment.

5. Counsel for Plaintiff does not oppose this motion.

WHEREFORE, Defendants respectfully request that this Court grant their motion for Defendants to file 101 facts in support of their joint motion for summary judgment.

Respectfully Submitted,

s/ Mary A. Johnston

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